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99 DEC 8 PM 4:02  
Guy M. Hicks  
General Counsel

December 8, 1999

EXECUTIVE SECRETARY

**VIA HAND DELIVERY**

Mr. David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37245

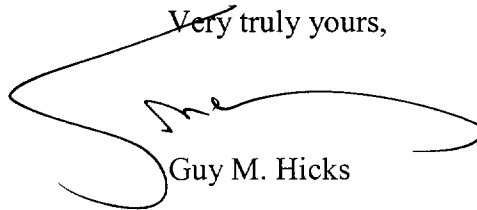
Re: *Third Party Testing of BellSouth OSS*  
Docket No. 99-00347

Dear Mr. Waddell:

Enclosed are fourteen copies of KPMG, LLP's Exceptions 1 and 2, and BellSouth's responses to those Exceptions, which were filed with the Georgia Public Service Commission on December 3, 1999.

Copies of the enclosed are being provided to counsel of record in this proceeding.

Very truly yours,



Guy M. Hicks

GMH:ch

Enclosure

FILE



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REC'D IN  
REGULATORY AFFAIRS

'99 DEC 8 PM 4 02

December 3, 1999

EXECUTIVE SECRETARY

**RECEIVED**

DEC 03 1999

**EXECUTIVE SECRETARY  
G.P.S.C.**

Ms. Helen O'Leary  
Executive Secretary  
Georgia Public Service Commission  
47 Trinity Avenue SW, Room 520  
Atlanta, GA 30334

**RE: Investigation into Development of Electronic Interfaces for BellSouth's  
Operational Support Systems; Docket No. 8354-U**

Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG LLP's Exceptions 1 and 2 along with BellSouth's responses to Exceptions 1 and 2 for filing in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,

David Frey  
Manager

Enclosures

cc: Parties of Record

**FILE**



KPMG LLP (KPMG) is a member firm of the KPMG network, which is a member of the KPMG network, which is a member of the KPMG network.



Date: November 12, 1999

**EXCEPTION REPORT**

An exception has been identified as a result of test development activities associated with the TAG Pre-Ordering Functional Test (PRE-1) and the TAG Pre-Ordering Documentation Evaluation (PRE-3).

**Exception:**

**BellSouth does not provide comprehensive and usable business rule documentation for submitting electronic pre-order transactions via the TAG interface.**

Business rule documentation provides a Competitive Local Exchange Carrier (CLEC) with clear and complete instructions on populating field or data element values necessary for each transaction type. Business rule documentation should contain the following components:

- Data element names and abbreviations
- Data element arrangement
- Data element definitions
- Data element usage  
Usage defines the circumstances under which the data element is required, conditional, optional, prohibited, or not applicable.
- Number of occurrences  
Occurrences define the number of times a data element may be included in the query.
- Data characteristic  
Data characteristics include the number of characters required or permitted in this field, and the type of character required or permitted (e.g., alpha or numeric).
- Specific rules for conditional usage requirements
- List of valid entries, where appropriate
- Examples of data inputs, where appropriate

**BellSouth Pre-Order Documentation**

BellSouth currently refers CLECs to a variety of documents to obtain pre-order business rule information, including the following:

- *TAG API Reference Guide*
- *TAG Programmer's Job Aid*
- TAG training presentation materials

None of the documents listed above provides a comprehensive business rule guide for pre-order queries using the TAG interface. While certain business rule components are included in one or more of the TAG documents (e.g., *API Guide* provides data element arrangement), these references are incomplete and sometimes inconsistent across the documents. Information on data element definitions, data characteristics, number of occurrences and conditional usage requirements is absent from all TAG pre-order documentation. Information on data element usage, found only in the presentation materials obtained during TAG training, is incomplete. Usage rules for pre-order inquiries are only provided for a select number of fields. In addition to the absence of business rules for submitting pre-order inquiries, BellSouth TAG documentation does not provide adequate information on pre-order response files. This information is required for development of integrated pre-order/order processes where information returned from pre-order inquiries is programmatically input into order entry systems.

Some of the pre-order business rule information is only provided during TAG training classes and is not available on the BellSouth documentation Website. As a result, there are inadequate document management procedures surrounding the updating and distribution of these materials.

**Impact**

The absence of a comprehensive set of pre-order business rules affects CLECs through:

- Increased time required for the design and population of pre-order transactions
- Order entry errors resulting from incomplete or inconsistent business information
- Increased lead times required for construction of integrated pre-order and order entry systems. Inadequate documentation on the data elements being returned on a pre-order response make it difficult to develop and update programs to retrieve pre-order response information, filter into a CLEC customer database, and integrate into subsequent orders.



Date: November 16, 1999

## **EXCEPTION REPORT**

**BellSouth does not provide comprehensive and usable business rule documentation for submitting electronic pre-order transactions via the TAG interface.**

A comprehensive document providing business rules for pre-order transactions is currently under development. It will contain a data dictionary providing definitions of all fields, usage rules, data characteristics, number of occurrences and valid entries, where applicable. This document will be available to all CLECs on the Interconnection website by the end of 1999.



Date: November 12, 1999

## **EXCEPTION REPORT**

An exception has been identified as a result of the ongoing Change Management Practices Review (CM-1).

### **Exception:**

**BellSouth's change management process does not include clearly defined and reasonable intervals for notifying customers about changes to electronic interfaces and supporting documentation.**

Based on interview sessions and documentation reviews conducted as part of the CM-1 Test, KPMG has observed that BellSouth's processes for introducing changes to electronic interfaces, business rules, and technical specifications do not include fully defined and published change management processes and intervals for items that affect Competitive Local Exchange Carriers (CLECs). BellSouth's published change management process should define intervals for both BellSouth- and CLEC-initiated changes, including changes that stem from both system enhancements (features) and corrections of defects.

Key elements of a comprehensive change management process include:

- Multi-dimensional classification system for changes.
  - ♦ Type (source).
  - ♦ Severity
  - ♦ Event category (interface, documentation, procedures).
- Defined intervals for all classifications.
- Opportunity for CLEC testing of changes.

Under current methods and procedures, documentation reflecting new interface fields, field formats, and business rules or procedures can be introduced and made effective the day of release. In September and October 1999, multiple on-line CLEC customer guide updates were released. In each case listed below, the notification interval was inadequate to allow CLECs to assess the operational impact of the change and make corresponding adjustments.

## BellSouth Georgia OSS Testing Evaluation

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| Document Title   | Posting Date                  | Notification Date | Notification Interval |
|--|-------------------------------|-------------------|-----------------------|
| BellSouth Guide to Interconnection, Issue 8E                 | September 22, 1999            | None              | 0 days                |
| LEO Implementation Guide (Volume 1), Issue 7K                | November 1, 1999 <sup>1</sup> | October 28, 1999  | 4 days <sup>1</sup>   |
| LEO Implementation Guide (Volume 4), Issue 7F                | October 28, 1999              | None              | 0 days                |
| Local Exchange Navigation System (LENS) User Guide, Issue 7B | September 9, 1999             | None              | 0 days                |
| Collocation Handbook, Issue 8                                | September 16, 1999            | None              | 0 days                |
| Local Number Portability Ordering Guide for CLECs, Issue 1B  | October 27, 1999              | None              | 0 days                |
| Telecommunications Access Gateway (TAG), Release 2.2.0.5     | October 30, 1999              | October 28, 1999  | 2 days                |

### Impact:

In the absence of a comprehensive change management process that includes defined intervals for change events, BellSouth's current practices could adversely affect CLEC business operations.

Examples of how CLEC operations could be affected include:

- Workforce management disruptions resulting from emergency allocation of CLEC personnel to address a required change(s) immediately.
- Order entry errors resulting from an inability to appropriately train CLEC order entry personnel in advance of a change. An increased frequency of errors results in higher order fallout rates that can lengthen the total interval for service installation.
- Reductions in customer satisfaction due to an inability to quickly process order types affected by a change event.

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<sup>1</sup> In the case of LEO Implementation Guide, Volume 1, Issue 7K, although the Web site's stated posting date reflects October 27, 1999, the document was actually available there on November 1, 1999. A CLEC would, therefore, have realized an actual notification interval of four days.



Date: November 16, 1999

**Exception:**

**BellSouth's change management process does not include clearly defined and reasonable intervals for notifying customers about changes to electronic interfaces and supporting documentation.**

**Key elements of a comprehensive change management process include:**

Severity – Designations are applicable to defects only and are internal measurements used in BellSouth. The EICCP process was initially developed to provide a means for CLECs to request enhancements. It is not the vehicle for CLECs to identify corrections for defects. Their account team or Customer Support Manager would be the point of contact for software defects, which would be directed to the appropriate project manager to be tracked and prioritized internally.

Defined intervals for all classifications – Intervals for CLEC initiated changes via the EICCP process are negotiated with the CLECs prior to any development work beginning

Opportunity for CLEC testing of changes – BellSouth provides several opportunities for CLECs to test changes, depending on whether they have been deemed production ready or are in a testing phase. If the CLEC is in application or validity testing, when they have made the changes to their system, they can test with BellSouth to ensure changes made by BellSouth address any problems they have encountered. TAG users have the option of scheduling testing whenever they make changes to their code that are a result of BellSouth initiated changes. Additionally, as BellSouth migrates to newer platforms, each CLEC developing their own front-end, or making mapping changes is required to test with BellSouth prior to sending production transactions.

**Documentation**

- BellSouth Guide to Interconnection is not OSS impacting, unless the CLEC orders Feature Group D service via an Access Service Request. (The interfaces used would exclude TAG and EDI)
- LEO Implementation Guide (Volume 1) was an emergency update based on CLEC input regarding some discrepancies in the LEO IG and the TAG documentation.
- LEO Implementation Guide (Volume 4) was updated to gain a consistent look and feel of the Issue 7 specifications in preparation for the Issue 9 updates. There was one CLEC-impacted change which was to correct a statement in the documentation that had been in error for quite some time regarding whether an 850 or 860 should be sent when an 860 is rejected.
- Collocation Handbook is not OSS impacting
- Telecommunications Access Gateway was updated in conjunction with LEO IG Volume 1 to correct some discrepancies between the TAG documentation and the LEO IG.





- Collocation Handbook is not an OSS impacting document.
-

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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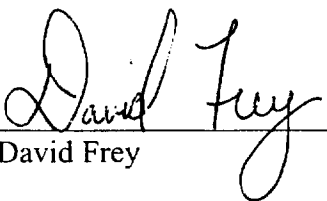
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This 3<sup>rd</sup> day of December 1999.

  
\_\_\_\_\_  
David Frey

KPMG  
303 Peachtree Street, N.E.  
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Atlanta, Georgia 30308  
(404) 222-3000

## CERTIFICATE OF SERVICE

I hereby certify that on December 8, 1999, a copy of the foregoing document was served on counsel for the petitioner and the entities seeking intervention, via the method indicated, addressed as follows:

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☐ Mail  
☐ Facsimile  
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